

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ZAVIUS AVERETTE, #217905)
)
Plaintiff,)
)
V.) 2:06-CV-399-MHT
)
LT. WILLIE COPELAND, et al.,)
)
Defendants.)

AFFIDAVIT

State of Alabama :

Elmore County :

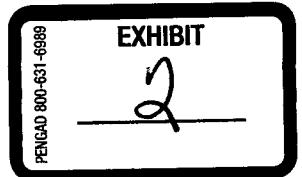
Before me, the undersigned authority, a Notary Public in and for said County and State of Alabama at Large, personally appeared Willie Copeland, who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Willie Copeland. I am presently employed as a Correctional Officer Supervisor I with the Alabama Department of Corrections at Staton Correctional Facility, P.O. Box 56, Elmore, Alabama 36025. I am over twenty-one years of age and have personal knowledge of the facts set forth below.

I have reviewed the complaint of Inmate Zavius Averette and this is my response to his complaint.

In this civil action, Inmate Zavius Averette alleges that he was physically assaulted and verbally abused by Lt. Copeland.

Inmate Zavius Averette was observed by Lt. Copeland in an unauthorized area of the institution masturbating. Lt. Copeland escorted Inmate Averette to the Shift



Commanders' Office where Inmate Averette was reprimanded by Lt. Copeland in regards to Inmate Zavius Averette inappropriate behavior, rule violation #38- Indecent Exposure/Exhibitionism. Lt. Copeland advised Inmate Averette that Inmate Averette was also in an Unauthorized Area, rule violation #50-Being in an Unauthorized Area. Lt. Copeland advised Inmate Averette that Inmate Averette would be receiving disciplinary action for violation of Rule #38- Indecent Exposure/Exhibitionism and Rule #50-Being In an Unauthorized Area. Inmate Averette was ordered to be placed in the Holding Unit by Lt. Copeland. In addition, there was an investigation conducted by the Alabama Department of Corrections Inspections and Intelligence Division, which concluded there was no validity to Inmate Averette allegations against Lt. Copeland.

I have no knowledge of the allegations being made by Inmate Averette about then Sgt. Mary Lee and Inmate Rozell.

To my knowledge, the above-related facts are the entirety of my involvement with Inmate Averette concerning the allegations on which his complaint is based.

I deny that I have violated any well-established civil rights of Inmate Averette.



WILLIE COPELAND

SWORN TO and SUBSCRIBED before me this 20 day of June 2006.



NOTARY PUBLIC

4/4/2010
My Commission Expires: